

# EXHIBIT J

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

**NOTICE OF DEPOSITION OF GOOGLE LLC**  
**PURSUANT TO FED. R. CIV. P. 30(B)(6)**

PLEASE TAKE NOTICE that Plaintiff depose, by oral questions, Defendant, pursuant to Fed. R. Civ. P. 26 and Fed. R. Civ. P. 30(b)(6), regarding the matters identified in the attached Schedule A.

The deposition will occur remotely by videoconference, commencing at 9:00 am EST on May 26, 2021, or at another mutually agreed date and time. The deposition will continue from day to day until complete.

The deposition will be held before a qualified court reporter and will be recorded videographically and stenographically.

Prior to the deposition, Defendant shall designate in writing to Plaintiff the name(s) of the person(s) who will testify on its behalf in response to this Notice.

Dated: May 5, 2021

By: /s/ Paul J. Hayes  
Paul J. Hayes (BBO #227000)  
Matthew D. Vella (BBO #660171)  
Kevin Gannon (BBO #640931)  
Daniel J. McGonagle (BBO #690084)  
Michael J. Ercolini (*pro hac vice*)  
**PRINCE LOBEL TYE LLP**  
One International Place, Suite 3700

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42. Analyses of the relative benefits, performance, and cost prepared by or for Google of any non-infringing alternatives or acceptable substitutes for the Accused Products.

43. **Google's cost of capital for tangible and** intangible assets, project-specific discount rates, and/or weighted average cost of capital.

44. Comparisons of the Accused Products (and/or features and functions thereof) to any other product of Defendant and/or of any other entity (and/or features and functions thereof).

45. Studies by Google or third parties discussing the benefits of using the Accused Products as opposed to other products, computer systems, devices, and other hardware/software having architectures that differ from those used by the Accused Products.

46. **Google's acquisition of DeepMind Technologies, including without limitaiton** purchase price allocations, the purchase rationale, board approvals, and studies and analyses of the activities of DeepMind Technologies prepared by or for Google.